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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 3:07-md-05944-SC (N.D. Cal.)

MDL No. 1917

This Document Relates to:

**DECLARATION OF MATTHEW D. KENT IN
SUPPORT OF ADMINISTRATIVE MOTION
TO FILE DOCUMENTS UNDER SEAL**

*Dell Inc. and Dell Products L.P., v. Hitachi,
Ltd., No. 13-cv-02171;*

1 I, **MATTHEW D. KENT**, declare as follows:

2 1. I am a Partner with the law firm of Alston & Bird LLP, counsel for Plaintiffs Dell Inc.
3 and Dell Products L.P. (collectively, "Dell") in the above-captioned action currently pending in the
4 U.S. District Court for the Northern District of California. I submit this declaration in support of
5 Direct Action Plaintiffs' Administrative Motion to File Documents under Seal, related to the Direct
6 Action Plaintiffs' Response in Opposition to Defendants' Motion to Exclude Certain Testimony of
7 Professor Kenneth Elzinga ("DAPs' Opposition Brief"). I have personal knowledge of the facts stated
8 herein, and I could and would competently testify thereto if called as a witness.

9 2. I am a member in good standing of the State Bar of Georgia and am admitted to practice
10 before the U.S. District Court for the Northern District of Georgia. I have also been admitted to this
11 Court *pro hac vice* as counsel for Dell pursuant to the Court's Pretrial Order No. 1 in the MDL
12 Proceeding.

13 3. Pursuant to Civil Local Rules 7-11 and 79-5, and in accordance with this Court's
14 General Order No. 62, effective May 10, 2010, Dell, by and through its counsel, respectfully request an
15 Order permitting it to file under seal portions of the DAPs' Opposition Brief and Exhibits 3, 4 and 13
16 to the Declaration of Debra D. Bernstein in Support of Direct Action Plaintiffs' Response in
17 Opposition to Defendants' Motion to Exclude Certain Testimony of Professor Kenneth Elzinga (the
18 "Bernstein Declaration").

19 1. **Exhibit 3** to the Bernstein Declaration is a true and correct copy of Expert Report of Dr.
20 Kenneth G. Elzinga, Robert C. Taylor Professor of Economics, University of Virginia, April 15, 2014,
21 designated by Dell as "Highly Confidential" under the protective order because it contains references
22 to information designated by Defendants and other parties as "Confidential" or "Highly Confidential"
23 under the protective order.

24 2. **Exhibit 4** to the Bernstein Declaration is a true and correct copy of Expert Rebuttal
25 Report of Dr. Kenneth G. Elzinga, September 26, 2014, designated by Dell as "Highly Confidential"
26 under the protective order because it contains references to information designated by Defendants and
27 other parties as "Confidential" or "Highly Confidential" under the protective order.
28

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

By: /s/ Matthew D. Kent
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